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March 10, 2005

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

**Re: Revision of the Commission's Rules to Ensure
Compatibility With Enhanced 911 Emergency
Calling Systems
CC Docket No. 94-102
Ex Parte Communication**

Dear Ms. Dortch:

Pursuant to Section 1.1206(b) of the Commission's rules, I am writing on behalf of OnStar Corporation ("OnStar") to inform you of a meeting held earlier today with Commission staff, relating to OnStar's pending Petition for Reconsideration of the Commission's December 1, 2003 order in the above-referenced docket. ^{1/} Specifically, OnStar's representatives provided an update on OnStar's ongoing efforts to develop a TTY-compatible solution, including an explanation of technical and OEM-related issues. A copy of the presentation slides distributed at the meeting is attached.

Participating in the meeting were: Michael Wilhelm, Jeff Cohen, David Siehl and Greg Guice of the Wireless Telecommunications Bureau; Bill Ball,

^{1/} See Revision of the Commission's Rules to Ensure Compatibility With Enhanced 911 Emergency Calling Systems, *Report and Order and Second Further Notice of Proposed Rulemaking*, 18 FCC Rcd 25340 (2003).

Ms. Marlene H. Dortch
March 10, 2005
Page 2

Bonita Lewis Bell and Steve Schwinke of OnStar; and the undersigned, Counsel to OnStar.

Respectfully submitted,

/s/ Ari Q. Fitzgerald

Ari Q. Fitzgerald

Enclosure
cc (w/enc.): Michael Wilhelm
Jeff Cohen
David Siehl
Greg Guice



20.18(c) Petition

- OnStar filed a Petition for Reconsideration and Clarification of §20.18(c)
 - Implementation Date
 - In-vehicle application issues
 - Technical Issues



April 2004 OnStar/FCC Meeting

- Commission staff orally clarified Dec. 31, 2006 compliance date
- Parties agreed to revisit engineering and driver distraction issues pending OnStar TTY development activities



Good News!

- OnStar development and validation of an in-vehicle TTY solution is proceeding well
- GM announced in January 2005 that by MY 2008 OnStar would be standard on all GM vehicles
- OnStar has extended its relationships with other OEMs, including Toyota, Honda, and Subaru
- By Dec. 31, 2006, TTY capability will be offered on a full range of OnStar-equipped vehicles

Request for FCC Action

- Confirmation that OnStar's TTY solution does not have to be activated when the vehicle is in motion
- Confirmation that OnStar is not required to make a TTY compatibility solution available on every OnStar-equipped vehicle in order to comply with Section 20.18(c)